

LAW OFFICES OF JOSEPH F. KILADA, P.C.

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VIA ECF & FACSIMILE

Hon. Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza
Brooklyn, New York 11201

June 26, 2012

**RE: United States v. Giuseppe Destefano
11-CR-30 (KAM)**

Dear Judge Matsumoto:

Mr. Destefano through his attorney, Joseph F. Kilada, respectfully requests that this court temporarily modify the order setting conditions of release and bond in respect to the travel restrictions.

Specifically, Mr. Destefano wishes to attend a gathering at the home of his future in-laws located at 31 Highland Drive Jackson NJ 08527 on Saturday July 7, 2012 from 1:00PM to 11:00PM.

I have consulted with the Assistant United States Attorney on this case, Elizabeth Geddes, and she has not consented to this application. I therefore respectfully ask the court to calendar this matter to hear argument and resolve the disagreement between the parties.

Mr. Destefano thanks the court for its consideration in this matter.

The application is granted.

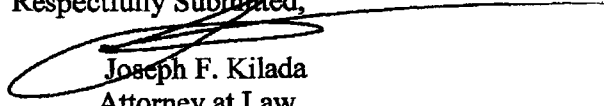
So ordered.

s/JG

usdj

6/28/12

Respectfully Submitted,


Joseph F. Kilada
Attorney at Law

UNITED STATES PRETRIAL SERVICES AGENCY
Eastern District of New York

DFF.

MEMORANDUM

DATE: June 27, 2012

TO: Honorable Kiyo A. Matsumoto
United States District Judge

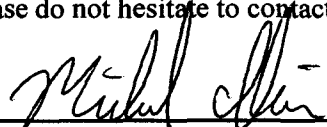
RE: DeStefano, Giuseppe
Docket: 11CR30
Pretrial Services Response to Request for Bond Modification

Reference is made to the above-named defendant who was ordered released by U.S. Magistrate Judge Roanne L. Mann on January 26, 2011 on a \$1 million bond secured by property and signed by five suretors. His conditions of release included:

- home detention with GPS monitoring and allowances for pre-approved attorney appointments, court appearances, work, and medical emergencies
- random home/employment visits by Pretrial Services
- random drug testing by Pretrial Services
- no contact or association with any cooperating witnesses or their family members, nor with co-defendants unless in the presence of counsel, or other individuals who may be members or associates of organized crime, including but not limited to the individuals on a list to be provided by the government
- defendant shall surrender his passport to Pretrial Services and shall not apply for a new passport.

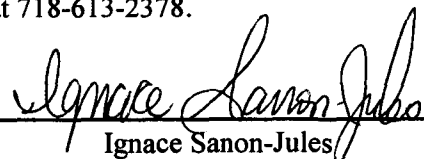
In a letter dated June 26, 2012, defense counsel asked Your Honor to permit the defendant time out on July 7, 2012 from 1pm to 11pm to "attend a gathering at the home of his future in-laws located at 31 Highland Drive, Jackson, NJ 08527." So far the defendant has remained in general compliance with his release conditions. He is also under GPS monitoring. For these reasons, Pretrial Services consents to the proposed bail modification. If Your Honor should have any other questions or require more information, please do not hesitate to contact Officer Michael Ilaria at 718-613-2378.

Prepared by:


Michael Ilaria

U.S. Pretrial Services Officer

Approved by:


Ignace Sanon-Jules

Supervising Pretrial Services Officer